

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Civil Action No. 04-12253-MLW

STEVEN McDERMOTT and
STACEY McDERMOTT,

Plaintiffs

v.

FEDEX GROUND PACKAGE SYSTEMS, INC.,
T.S. PRUITT, ALLEGIANCE HEALTHCARE,
INC., D. PONCE, E.W. WYLIE CORPORATION,
D.W. SMITH ARSENBURGER TRUCKING, INC.,
J.T. FOSBRINK, RYDER TRUCK RENTAL,
LORRAINE ODZANA as ADMINISTRATRIX OF
THE ESTATE OF JAMES J. ODZANA,
SHORELINE TRANSPORTATION, INC., JACYLYN
PALETTA as ADMINISTRATRIX OF THE
ESTATE OF MARIO J. CASTRO,

Defendants

AFFIDAVIT OF LOUISE DOLAN

I, Louise Dolan, do hereby by attest upon my personal knowledge, the following:

1. I am Manager of Industrial Health and Education for Hospital Central Services, Inc. ("HCS"), and have been employed by HCS for eight (8) years.
2. HCS is a Pennsylvania corporation, with a principal place of business and corporate office located at 2171 28th Street, Southwest, Allentown, PA 18103.
3. At the time of the accident that is the subject of Plaintiff's Complaint, February 7, 2003, the decedent, James J. Odzana, was an employee of HCS, as deliveryman/truck driver for HCS' laundry and linen services out of the Scranton, PA textile processing plant located at 317 Linden St., Scranton, PA 18503. Odzana was making a delivery run for HCS at the time of the accident.
4. At the time of the accident, Odzana was operating a truck rented from Ryder to HCS.

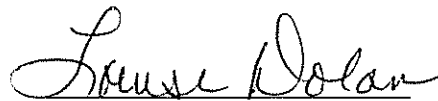
5. HCS also has textile processing plants located in Kingston, PA, Asbury Park and Camden, NJ, and Baltimore, MD. HCS provides linen rental services to healthcare facilities in Pennsylvania, New Jersey, New York, Maryland and Washington, DC. The Scranton plant, out of which Odzana made deliveries, provides linen services to healthcare facilities located only in Pennsylvania, New York and New Jersey.

6. HCS has no offices in Massachusetts and provides no linen services in Massachusetts and does not conduct any business in Massachusetts.

7. Odzanas' deliveries were only between the HCS plant, located at 317 Linden Street, Scranton, PA 18503, and various hospitals in New Jersey, New York and Pennsylvania.

8. Odzana never made any delivery runs to, from or through Massachusetts.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY, THIS 10th DAY OF AUGUST, 2007.

A handwritten signature in cursive script, reading "Louise Dolan".

Louise Dolan
Manager of Industrial Health and Education
Hospital Central Services, Inc.